

PX28

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF MINNESOTA

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4 In Re:

5 Bair Hugger Forced Air Warming

6 Products Liability Litigation

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8 This Document Relates To:

9 All Actions MDL No. 15-2666 (JNE/FLM)

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12 DEPOSITION OF JOHN P. ABRAHAM, Ph.D.

13 VOLUME I, PAGES 1 - 396

14 JULY 20, 2017

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17 (The following is the deposition of JOHN P.

18 ABRAHAM, Ph.D., taken pursuant to Notice of Taking

19 Deposition, via videotape, at the offices of Ciresi

20 Conlin L.L.P., 225 South 6th Street, Suite 4600, in

21 the City of Minneapolis, State of Minnesota,

22 commencing at approximately 9:26 o'clock a.m., July

23 20, 2017.)

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25

12:37:46 1 side which would cool off the drape. I didn't account
12:37:50 2 for that cool air heat transfer to the drape, nor did
12:37:55 3 I account for heat from any Bair Hugger air to the
12:37:59 4 drape because it wasn't material to my analysis.

12:38:03 5 Q. Okay. Would you agree with me that what was
12:38:13 6 material to your analysis -- Strike that.

12:38:16 7 Did you do the measurements in the OR that
12:38:46 8 account for your geometry?

12:38:49 9 A. No. The measurements were sent to me. I
12:38:53 10 double-checked the width and length of the room, but I
12:38:56 11 did not do other measurements.

12:38:58 12 Q. How many times did you go visit the OR that
12:39:00 13 you modeled?

12:39:01 14 A. Once.

12:39:02 15 Q. And that would have been in 2015?

12:39:04 16 A. Yes.

12:39:05 17 Q. Who was there with you?

12:39:09 18 A. Attorneys, or maybe it was one attorney, I
12:39:11 19 can't recall, from the initial law firm. There were I
12:39:20 20 believe hired surgeons and nurses who replicated a
12:39:24 21 surgery. An attorney from 3M, Janell. Two engineers
12:39:31 22 from 3M. And Jennifer Wagner and Brian Plourde. And
12:39:41 23 I think two lighting people.

12:39:44 24 Q. "Lighting"?

12:39:44 25 A. Or cam -- camera people.

12:39:45 1 Q. Oh, was this filmed?

12:39:48 2 A. The --

12:39:49 3 Q. The experiments?

12:39:50 4 A. The visualization in the OR?

12:39:52 5 Q. Yeah.

12:39:52 6 A. Yes.

12:39:56 7 Q. Okay. Do you know how much film was taken?

12:39:58 8 A. I have no idea.

12:39:59 9 Q. Okay. The two engineers from 3M, do you

12:40:02 10 know who they are?

12:40:02 11 A. I know one of them.

12:40:04 12 Q. Who?

12:40:04 13 A. Andy Chen.

12:40:06 14 Q. Who's Andy Chen?

12:40:07 15 A. An engineer from 3M.

12:40:09 16 Q. Is that how you know him? Did you know him

12:40:11 17 before that day?

12:40:12 18 A. I did know him --

12:40:13 19 Q. Okay.

12:40:13 20 A. -- before that day.

12:40:15 21 Q. How?

12:40:15 22 A. I think he got his Ph.D. under Sparrow, who

12:40:19 23 was my doctoral advisor.

12:40:20 24 Q. Before or after you?

12:40:21 25 A. After me.